

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 29, 2008

Name of company covered by this certification: PCCW Global, Inc. and PCCW Global Limited

Form 499 Filer ID: 825873 and 825874

Name of signatory: Patrick Hannon

Title of signatory: President

I, Patrick Hannon, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Sincerely,



Patrick Hannon

**STATEMENT OF PCCW GLOBAL
REGARDING COMPLIANCE WITH CUSTOMER PROPRIETARY NETWORK
INFORMATION (“CPNI”) RULES**

March 1, 2008

PCCW Global, Inc. and PCCW Global Limited, collectively hereinafter referred to as “PCCW Global,” provides this statement pursuant to Section 64.2009(e) of the Federal Communications Commission’s (“FCC”) rules, 47 C.F.R. §64.2009(e), to accompany its March 1, 2008 annual customer proprietary network information (“CPNI”) compliance certification.

Section 222 of the Communications Act (codified at 47 U.S.C. §222) establishes requirements for carriers to safeguard the use and dissemination of CPNI. The CPNI safeguards are implemented by FCC regulations set forth at 47 C.F.R. §64.2001-64.2011 (the “CPNI Rules”). In compliance with these rules, PCCW Global has adopted internal operating procedures and a compliance plan to implement the CPNI Rules. This statement explains how PCCW Global’s internal operating procedures ensure that it is in compliance with the CPNI Rules. This statement also explains any actions PCCW Global has taken against data brokers and a summary of all customer complaints received during the past year, 2007, concerning the unauthorized use of CPNI.

PCCW Global’s internal operating procedures and compliance plan contain the following elements:

Overview:

PCCW Global takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. PCCW Global does not disclose or permit access to CPNI to track customers that call competing service providers. PCCW Global is committed to notifying the FCC of any methods of pretexting it discovers and of any actions it takes against pretexters or data brokers. Accordingly, PCCW Global’s internal operating procedures and compliance plan are designed to ensure that PCCW Global is in compliance with the CPNI Rules.

Designated Compliance Officer and Annual Certification/Record Retention:

PCCW Global has designated one or more officers, as an agent or agents of the company to act as the CPNI Compliance Officer. Such CPNI Compliance Officer is housed in PCCW Global’s Group Legal Department. The Compliance Officer is responsible for ensuring that PCCW Global is in compliance with CPNI rules and regulations. The Compliance Officer is the point of contact for anyone with questions concerning CPNI, whether internal or external.

The Compliance Officer shall file a Compliance Certification with the FCC by March 1 of each year, for data pertaining to the previous calendar year. Such certification shall be

submitted with an accompanying statement explaining how PCCW Global complies with the FCC's CPNI Rules.

In addition, PCCW Global shall retain central CPNI files with the Compliance Officer in accordance with required retention periods.

Training:

PCCW Global periodically trains its staff in an effort to ensure that its employees, in accordance with FCC regulations, including the CPNI Rules: i) understand what CPNI is, ii) assist in carrying out PCCW Global's obligations to protect CPNI, iii) understand when they are and when they are not authorized to use or disclose CPNI, and iv) keep records regarding any use of CPNI and customer complaints regarding CPNI.

PCCW Global employees are required to review PCCW Global's CPNI practices and procedures discussed in various training sessions throughout the year as well as acknowledge and comprehend PCCW Global's CPNI policy.

PCCW Global's CPNI policies include reasonable measures to discover and protect against activity that is indicative of pretexting and employees are instructed to notify the CPNI Compliance Officer if any such activity is suspected.

Disciplinary Procedures:

PCCW Global has established a disciplinary process against any violation of its internal policies, including improper use of CPNI. The disciplinary action is based on the type of severity of the violation and could include any or a combination of the following: i) retraining the employee on CPNI rules, ii) notation in the employee's personal file, iii) formal written reprimand, or iv) suspension or termination. This disciplinary process is reviewed with all employees and is published in PCCW Global's CPNI company policy.

PCCW Global's Use of CPNI (Approval and Notification):

PCCW Global does not use CPNI for any purpose. PCCW Global prohibits the use of CPNI for marketing purposes by itself, its affiliates and third parties for marketing purposes.

Under Section 222 and the Commission's CPNI rules, PCCW Global may use CPNI for the following purposes:

- To initiate, render, maintain, repair, bill and collect for services;
- To protect its proprietary rights; or to protect its subscribers or other carriers from fraudulent abusive, or the unlawful use of, or subscription to, such services;
- To permit access to CPNI where required by law (i.e. under a lawfully issued subpoena).

Approval: For customer-initiated telephone inquiries regarding or requiring access to CPNI, PCCW Global authenticates the customer or its authorized representative, through a pre-established password, without prompting through the use of readily available biographical or account information. If the customer cannot provide a password, then PCCW Global only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record. If a customer does not want to establish a password, the customer may still access call detail based on a customer-initiated telephone call, by asking PCCW Global to send the call detail information to an address of record or by the carrier calling the telephone number. PCCW Global password-protects online access to all CPNI, call detail and non-call detail. In addition, PCCW Global requires affirmative written/electronic subscriber approval for the release of CPNI to third parties.

Notification of Account Changes: PCCW Global notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.

Notification of Breaches:

Employees will immediately notify the Compliance Officer in Group Legal of any breach or suspected breach. In the event that the Compliance Officer determines that a breach has occurred, PCCW Global has procedures in place to notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs PCCW Global to delay notification, or PCCW Global and the investigatory party agree to an earlier notification.

PCCW will maintain a record of all CPNI security breaches, including description of the breach and the CPNI involved, along with the notifications sent to law enforcement and affected customers. PCCW Global maintains records of any discovered breaches and notifications to the United States Secret Service and the FBI regarding those breaches. In addition, PCCW Global shall provide a summary of any breach in the annual compliance certificate filed with the FCC.

Actions Taken Against Data Brokers and Customer Complaints:

In accordance with Section 64.2009(e), PCCW Global states that it took no actions against data brokers in 2007.

Furthermore, in accordance with Section 64.2009(e), PCCW Global states that it received no customer complaints in 2007 regarding the unauthorized release of CPNI.